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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 PAUL TAYLOR, an individual,
13 Plaintiff,
14 vs.
15 MGM GRAND HOTEL, LLC, a Nevada
Limited Liability Company; DOES I – X,
16 inclusive; and ROE CORPORATIONS I – X,
inclusive,
17 Defendants.

Case No. 2:22-cv-02069-APG-DJA

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF’S
COMPLAINT [ECF No. 1]
(FIRST REQUEST)**

18 IT IS HEREBY STIPULATED by and between Plaintiff Paul Taylor (“Plaintiff”) through
19 his counsel Jennings & Fulton, Ltd., and Defendant MGM GRAND HOTEL, LLC (“Defendant”),
20 by and through its counsel Jackson Lewis P.C., that Defendant shall have an extension, up to and
21 including Thursday, March 16, 2023, in which to file a response to Plaintiff’s Complaint (ECF No.
22 1). The parties further stipulate that should Defendant file a Rule 12 motion in response to the
23 Complaint, Plaintiff shall have twenty-one (21) days from filing to oppose the motion, and that
24 Defendant shall reply in the ordinary course. This Stipulation is submitted and based upon the
25 following:

- 26 1. Defendant’s response to the Complaint (ECF No. 1) is currently due on February
27 14, 2023.
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1 2. Defendant is preparing a response to the Complaint. However, completing the
2 response has been delayed due as Defendant's counsel has recently been required to attend to other
3 matters including the deposition of a plaintiff, discovery disputes, and preparation of dispositive
4 motions in separate cases, which has delayed completing a response to the Complaint in this matter.

5 3. Counsel for the parties have recently discussed potential opportunities for resolution
6 and wish to continue those discussions prior to pursuing litigation.

7 4. For the reasons set forth above, the parties stipulate that Defendant may have up to
8 and including March 16, 2023 to file a response to the Complaint.

9 5. The parties have also discussed the possibility that Plaintiff's Counsel will be
10 engaged in a trial set to begin February 27, 2023 and is estimated to take 25 judicial days. In the
11 event that the Defendant files any motion under Fed. R. Civ. P. 12, Plaintiff's Counsel anticipates
12 he will be unable to prepare a response in the normal course to oppose the motion due to the burdens
13 of an ongoing trial. As such, the parties agree that if Defendant files a motion in response to the
14 Complaint, Plaintiff will have twenty-one (21) days to file any opposition.

15 6. This is the first request for an extension of time for Defendant to file a response to
16 Plaintiff's Complaint.

17 7. This request is made in good faith and not for the purpose of delay.

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8. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 14th day of February, 2023.

JENNINGS & FULTON, LTD.

JACKSON LEWIS P.C.

/s/ Logan G. Willson

/s/ Kyle J. Hoyt

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Attorneys for Defendant

MGM Grand Hotel, LLC

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:



DANIEL J. ALBRECHTS

UNITED STATES MAGISTRATE JUDGE

DATED: February 15, 2023

4859-0198-7152, v. 2